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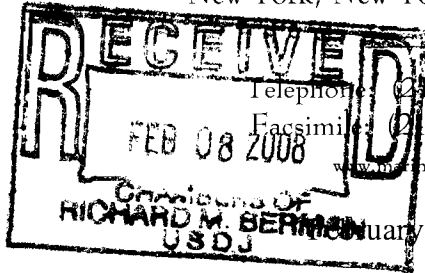
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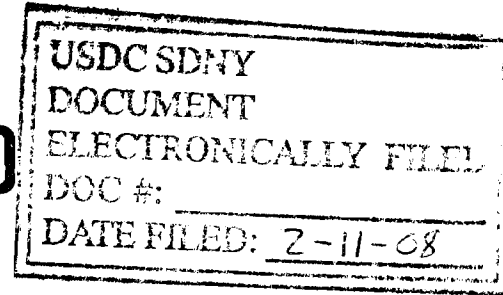
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BY HAND DELIVERY

Judge Richard M. Berman
United States District Court
Southern District of New York
40 Centre Street, Courtroom 706
New York, NY 10007

MEMO ENDORSED

P2



Re: Zim Integrated Shipping Services, Ltd. v. Belco Resources, Inc. et al.
Southern District of New York, 07 Civ. 5861 (RMB)(GWG)

Dear Judge:

We are attorneys representing plaintiff Zim Integrated Shipping Services, Ltd., in connection with the above referenced action and we are writing you to request the authorization to file the declaration of Dragontrans Shipping Services, Ltd., ("Dragontrans"), a defendant located in China who has not yet appeared or otherwise pleaded, in support of plaintiff's opposition to defendants Sinochem Jiangsu Corporation and Nanjing Huabin Foreign Trade & Economics Co., Ltd.'s motion to dismiss on grounds of *forum non conveniens*.

Although requested in early January, we only received last Monday a declaration under penalty of perjury from Mr. Robin Du, Dragontrans' General Manager located in Ningbo, China, in support of Plaintiff's opposition to the motion to dismiss. In his declaration, Mr. Du offers to make himself available to testify in the United States before this Court and further offers to disclose all documents in his possession in relation to the booking of the cargo subject to this litigation. Attached please find a true and accurate copy of Mr. Du's declaration.

This declaration may certainly affect the defendants' *forum non conveniens* analysis to the extent one of the Chinese defendants, a key prospective witness, offers to testify in this Court and perceives this U.S. court as an adequate forum to adjudicate this matter.

We would like to be authorized to file Mr. Du's declaration so as to afford the defendants an opportunity to respond to it in their reply papers due on February 22, 2008, after this Court granted last Wednesday the defendants' request for a two week extension of time to file their reply.

Respectfully submitted,

O. D. L. DuPont
Olivier D. L. DuPont

By Facsimile and E-mail:

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one. We need a certified translation of the declaration.

SO ORDERED:
Date: 2/11/08 Richard M. Berman
Richard M. Berman, U.S.D.J.